



Pima County Enrollment Coalition

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On behalf of the Pima County Enrollment Coalition, we are writing in response to Arizona's Section 1115 Waiver proposal. As a community coalition forged to improve access to medical services for Pima County residents, we support the changes to AHCCCS that will improve members' health outcomes, streamline and integrate care, and reduce overall healthcare costs. The Coalition recommends that CMS give careful consideration to both the intended and unintended consequences of the proposed Arizona's Section 1115 Waiver. We support a Waiver that will continue to help AHCCCS deliver high quality healthcare to underserved populations, improve access to care, and help reduce health disparities in our communities.

Overall, we believe the proposed cost sharing, lifetime limits, elimination of non-emergency transportation, and work requirement provisions related to AHCCCS Cares and AHCCCS Works to be barriers to care that will result in poorer health outcomes and increases in the number of uninsured. Furthermore, the Coalition questions the prudence of adding potentially costly and complex administrative procedures that risk diverting money away from the delivery of direct health services and provides little value added benefits to AHCCCS members and providers. We are concerned about the establishment and added burden of managing consumer payables, withdrawals, and debts to the state that may lead to high administrative costs and additional workload for several state departments that are already working with limited staffing. As a community coalition comprised of community partners and stakeholders who routinely have high levels of interaction with AHCCCS members and their families, we propose the following recommendations to the 1115 Waiver proposal currently under consideration.

Premiums and Co-payments

We strongly oppose requiring the payment of premiums for AHCCCS members. This may result in severe healthcare suspension consequences and debt accruals for those who cannot make timely payments. Finances for those in highly vulnerable situations will be redirected to paying required premiums and co-pays, and be unavailable for competing necessities like food, shelter and clothing. For the able bodied adult with limited resources, these payments will pose additional barriers to both health care access and upward mobility. Additionally, co-payments pose a barrier for low-income vulnerable populations, and may deter individuals from seeking healthcare in both emergent and non-emergent situations which may result in more people becoming more acutely ill and requiring greater and more expensive medical intervention. Emergency department use may be necessary in non-emergent situations if there are no alternatives to seek care, especially in rural settings. Individuals may choose to not seek medical services until they believe it is an emergency since the cost is waived only if the patient is admitted or meets other requirements.

HSA-like accounts

We strongly oppose the proposed AHCCCS Cares Account, which has been characterized as an "HSA-like" account. The proposed AHCCCS Cares Account seems to have few of the benefits of a true Health Savings Accounts (HSA) such as tax advantages and coverage of expenses such as copayments. Instead, the AHCCCS Cares account is limited to a list of non-covered services.

It is the Enrollment Coalition's experience that there is low health and financial literacy levels among the AHCCCS population that may make navigating the proposed changes difficult. Many of our Coalition



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members have worked with Pima County residents to improve health literacy and while we have seen gains, there is significant work to be done. We believe that HSA-like accounts pose an unnecessary layer of bureaucracy and will be difficult for AHCCCS member to understand and manage on their own. Even in the private sector, consumers find the management of the HSA-like accounts requires a high level of financial literacy, time management, and access to adequate advisory resources.

If, however, HSA-like accounts are implemented, we recommend that individuals should be able to withdraw funds from their accounts to be reimbursed for co-pays, similar to a conventional HSA account. It is a pity that funds set aside for healthcare expenses cannot be used to purchase necessary health services, and members must instead default into debt to the state, forgo receiving health services, or lose coverage altogether. We also recommend that access to these accounts not be limited by work requirements and payment of premiums.

Elimination of non-emergency transportation

We strongly oppose the elimination of non-emergency transportation and the narrow view of appropriate and medically necessary use of emergency department services. In our experience, transportation is a significant barrier to receiving healthcare, even within metropolitan city limits. Public transit services are not always accessible to all and many are unable to reach appointments for needed care without transportation support. Tucson's public transit system recently ended a 42 day strike, one which left many low income residents unable to get to work or medical appointments. The recent strike is an example of circumstances that cannot be planned for and for which there are few alternatives. Medically necessary appointments, especially for those on dialysis or undergoing chemotherapy, are critical. To support the Delivery System Reform Incentive Payments, maintain non-emergency transportation to encourage continued care and positive health outcomes for AHCCCS Members.

We thank you for the opportunity to share our insights on Arizona's Section 1115 Waiver proposal. We applaud the innovative efforts to continue the legacy of high quality healthcare, improved access, and fiscal responsibility to Arizona's Medicaid program.

Sincerely,

The Pima County Enrollment Coalition

Arizona PIRG
CODAC Behavioral Health Services
COPE Community Services
El Rio Community Health Center
HOPE
Marana Health Center
Mariposa Community Health Center
Northwest Medical Center
Pima Community Access Program
Pima County Community Services
Pima County Health Department
Planned Parenthood
St. Elizabeth's Health Center



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United Way of Tucson and Southern Arizona
Wellness Connections

Yumi Wong

Mary Wong

Edward Wong

Gabriela Acuna

Carol Montgomery

Charmayne Ortega

Laura Morgan

Susan Yager

Penny North

Hope Busto-Keyes, APRN

Sylvia Brown